



October 11, 2019

Bureau Chief
Air Quality Bureau
New Mexico Environmental Department
525 Camino de los Marquez, Suite 1
Santa Fe, New Mexico 87505

Certified Mail/Return Receipt

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RE: Amendment-3 to the May 15, 2019 Fenceline Benzene Monitoring Corrective Action Plan for the Artesia Refinery: Plan for Removal of Tank 57

HollyFrontier Navajo Refining LLC (Navajo) submits this letter to update the Fenceline Benzene Corrective Action Plan (CAP) for the Artesia, New Mexico refinery pursuant to the National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (MACT CC) at 40 CFR 63.658(h). Specifically, this letter describes Navajo's plan to remove Tank 57 from liquid service and follows our CAP letters of May 15, 2019, July 3, 2019 and September 3, 2019. The tank will be emptied, de-gassed and cleaned in preparation for inspection during the 4th quarter. Going forward, Navajo intends to keep Tank 57 Out-of-Service (OOS) and thus follow our applicable OOS Procedure. Additionally, Navajo intends to "air gap" the tank from process lines, which is the physical disconnecting of all process lines, such that there is a gap between the lines and the tank that can be seen visually. This will render Tank 57 fully nonoperational and will require a Management of Change (MOC) for the OOS and likewise, for any potential future use of Tank 57.

We appreciated the opportunity to discuss our plan for Tank 57 with the U.S. Environmental Protection Agency (USEPA) and New Mexico Environment Department (NMED) on our September 9, 2019 conference call. Navajo remains committed to proactively addressing the source of benzene emissions detected at the Artesia fenceline and working cooperatively with USEPA and NMED on these issues.

Tank 57 Complete API 653 Inspection

Pursuant to EPA's September 16, 2019 letter, Navajo will provide at least 30 calendar days advance notice to EPA and NMED of a complete API 653 inspection of Tank 57. Additionally, Navajo will submit the complete API 653 report to EPA and NMED within 15 days after completion of the inspection.

Tank 57 Empty, De-Gas and Clean for Inspection

Navajo communicated on the September 9th call with NMED and EPA that Tank 57 was emptied of all benzene containing material on Friday September 6th, sponge material removed on September 7th and the roof was refloated with Naphtha Splitter bottoms. The tank level was continuously raised to 8 ft. to be put on high legs. Filling ended on September 10th. Pursuant to EPA's September 16, 2019 letter, while Tank 57 is emptied and degassed, Navajo will conduct a visual inspection of the floating roof deck, deck fittings, and rim seals from both the topside and underside of the roof deck, and provide at least 30 calendar days advance notice to EPA and NMED of the inspection. Additionally, within 15 calendar days after the completion of the inspection, Navajo will submit to EPA and NMED a report of all inspection results.

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The next steps to empty, de-gas and clean Tank 57 include the following measures:

- Mobilize thermal oxidizer (TO) to be onsite the week of 10/14.
- Pump remaining liquid out to blending tank 411 with the transfer pump until the pump loses suction – begin the week of 10/14.
- Switch to temporary pump connected to the water draw to remove remaining liquid (sump draw).
- When the roof is set on its legs (landed), initiate a nitrogen blanket and TO controls.
 - Nitrogen is used to fill the vapor space created when the roof is landed and emptied. This is to limit the amount of oxygen under the roof to eliminate the potential for a flammable atmosphere inside the tank.
 - The TO will be used to control vapors that may be emitted during the emptying process to minimize impact to the environment. A permit for this activity was received on September 20th.
- When removal of liquid from the water draw is complete (minimal product remains) introduce a diesel flush to sponge the residual naphtha remaining in the tank.
- The next flush will be water with Zymeflow chemical to sponge any naphtha remaining in the tank
- Pump the sponge material out to frac tanks
- The tank atmosphere will be checked periodically for VOCs to verify the de-gas is complete. The TO is in use until the de-gas is complete. Target is a lower explosive limit (LEL) concentration of less than 10%.
- Once the tank can be safely opened, entry will be made and cribbing installed
- Clean to remove any minor amount of liquids and solids remaining
- Tank will remain open for inspection
 - API 653 Inspection
 - Inspection of the floating rood deck, deck fittings, and rim seals

As noted above, Navajo intends to keep Tank 57 OOS and nonoperational for the near future. We will follow our OOS Procedure and air gap the tank from process lines. This will require an MOC for the OOS and likewise, prior to any future use. Additionally, Navajo will provide at least seven (7) calendar days written notice to EPA and NMED prior to any refilling of the tank.

If you have any questions regarding this CAP update, please contact me at Scott.Denton@HollyFrontier.com or by phone at 575-746-5487. Thank you again for your consideration.

Sincerely,



Scott M. Denton
Environmental Manager

Cc: Chief
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